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5 Attorney for Defendants
6 Southwest Concrete Pumping, LLC;
Jordana Buchanan; Zachary Buchanan;
7 Top Water Holdings, LLC; Lillibeth
Benavides; AEB Enterprises, LLC; ACJ
8 Consulting, LLC; Allan Benavides

9 **UNITED STATES DISTRICT COURT**

10 **FOR THE DISTRICT OF NEVADA**

11 ***

12 CURTIS LUX, an individual; JUSTIN
HYMES, an individual; KATHY WADKINS,
13 an individual; MICHAEL BATES, an
individual; AARON MATHIS, an
14 individual; RICK GORDON, an
individual; ISHMEL BYRD, an individual;

15 Plaintiffs,

16 vs.

17 JORDANA BUCHANAN, an individual;
18 ZACHARY BUCHANAN, an individual;
ALLAN BENAVIDES, a.k.a ALLAN
19 GLICKSTEIN, an individual; LILLIBETH
BENAVIDES, an individual; SOUTHWEST
20 CONCRETE PUMPING, LLC, a Nevada
Limited Liability Company; AEB
21 ENTERPRISES, LLC, A Nevada Domestic
Limited Liability Company; ACJ
22 CONSULTING, LLC, A Nevada Domestic
Limited Liability Company; TOP WATER
23 HOLDINGS, LLC, A Nevada Domestic
Limited Liability Company; DOES I-X,
24 unknown individuals; ROES I-X,
unknown corporate entities and/or
25 business entities;

26 Defendants.

CASE NO.: 2:23-cv-00839-MMD-NJK

**STIPULATION AND ORDER TO EXTEND
THE DEADLINES FOR DISPOSITIVE
MOTIONS AND PRETRIAL ORDER**

FIRST REQUEST

1 Pursuant to LR 6-1 and LR 26-4, the Parties, by and through their respective
 2 counsel of record, hereby stipulate and request that this Court extend the deadline
 3 for the Parties to file Motions for Summary Judgment in the above-captioned case
 4 thirty (30) days, up to and including January 26, 2024. The Parties also stipulate
 5 and request that the deadline for filing the pretrial order in this matter be
 6 extended to and including February 26, 2024.¹

7 This Request for an extension of time is not sought for any improper purpose
 8 or other purpose of delay. This request for extension is based upon the following:

9 Discovery closed on November 27, 2023. Outstanding discovery disputes
 10 remain. The parties have met and conferred regarding these disputes and
 11 anticipate that one or more motions to compel will be filed. Additionally, two
 12 motions to dismiss have been fully briefed and the Parties are awaiting
 13 adjudication of the motions.

14 Counsel for the Parties have met and conferred on the above and have
 15 agreed that, to best serve the interests of the Parties and this Court, and to make
 16 the upcoming summary judgment motion practice more efficient for both this
 17 Court and the Parties, the best remedy at this time is to reasonably extend the
 18 dispositive motion deadline for both Parties.

19 WHEREFORE, the Parties respectfully request that this Court extend the time
 20 for the parties to file their dispositive motions by thirty (30) days from the current
 21 deadline of December 27, 2023 up to and including January 26, 2024, and to
 22 extend the deadline for filing the pretrial order by thirty (30) days, from January 26,
 23 2023 to and including February 26, 2024.

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 28 ¹ February 25, 2024, falls on a Sunday.

1 DATED this 19th day of December,
2 2023.

3 **LEWIS BRISBOIS BISGAARD & SMITH**

DATED this 19th day of December,
2023.

**MULLINS & TRENCHAK, ATTORNEYS
AT LAW**

4
5 /s/ Jeffrey Winchester

/s/ Phillip Trenchak

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16 **ORDER**

17 IT IS SO ORDERED.

18 Dated this 19th day of December, 2023.

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22 U.S. DISTRICT COURT JUDGE